



19 September 2023

## **Waltham Forest Local Plan Part 1 Proposed Main Modifications**

Thank you for consulting Transport for London (TfL). The following response has been prepared by officers in TfL Spatial Planning reflecting TfL's statutory role as the strategic transport authority. It is separate from any response submitted by Transport Trading Limited Properties (TTLP) in their capacity as a landowner and potential developer.

We have the following comments on the proposed main modifications. Our principal concern is in relation to MM139 and so we present that first.

MM139 – TfL Spatial Planning and the Waltham Forest Local Plan team have met to discuss the proposed main modifications to Policy 68 and agree that they would benefit from further revision to ensure that they fully reflect the agreed TfL Statement of Common Ground (19th July 2021). The TfL Statement of Common Ground included the following:

*It is noted that the LBWF intends to propose modifications to the Proposed Submission Document to be agreed by the Inspectors examining the Local Plan. In this regard, TfL would suggest further opportunities to tighten policy wording (for better clarity) on the following matters.*

*Policy 68 – in particular, clarifying if car-free approach applies to non-residential and mixed-use developments and applying rigorous approach similar to residential developments. TfL also suggests clarity regarding parking for GP's – to ensure that such provision is not misused, and necessary limits are applied. It should be noted that irrespective of this comment, both organisations are aligned in principle about the need to introduce safeguards.*

It is agreed by both parties that it is clearly the intention to apply the car free approach to non-residential and mixed-use developments (as evidenced in Air Quality Study 2 for example), and that the Plan would benefit from making this explicit in the wording of Policy 68.

In order to provide clarity and to ensure consistency with the London Plan it is proposed that the opening paragraph of policy 68 should be amended to refer to non-residential and mixed-use development as shown in red below:

*In order to encourage and promote active and sustainable transport as the main means of travel in Waltham Forest, to improve air quality, improve personal health and well-being and respond to the Climate Emergency, all new residential, **non-residential and mixed-use** developments (major and minor) in the borough should be car-free*

In order to provide clarity and consistency with the London Plan and to better reflect how mixed-use developments will be treated, the wording of policy 68 part B should also be amended to make it clear that London Plan car parking standards will be applied where they are more restrictive than the standards set out in appendix 1 of the Local Plan e.g. by requiring car free retail development in PTAL 4 – 6 or setting lower maximum parking standards for offices in PTAL 1 – 4 in Opportunity Areas or industrial uses in PTAL 1 – 3 in Opportunity Areas.

The proposed modification to Policy 68 part B requiring mixed use schemes to provide specific parking for different uses would not be consistent with the London Plan or the Local Plan appendix on parking standards and should be replaced with wording that is consistent with the policy objective to seek to minimise parking requirements. London Plan Policy T6.3 states that ‘*Opportunities should be sought to make the most of all existing parking, for example using office parking for retail outside working hours. Where shared parking is identified, overall provision should be reduced to make better use of land and more intensively use the parking that remains.*’ Local Plan Appendix 1 Parking Standards in paragraph 1.32 (Multiple Uses) and 1.35 (Dual Use) specifically encourages multiple use of parking facilities and states that ‘*In such cases, the Council expects that the overall combined provision will be reduced.*’

These changes could be achieved by amending the wording of Policy 68 part B as shown in red below:

*Proposals must not exceed the maximum parking standards set out in the London Plan and the Parking Standards included in Appendix 1 'Parking Standards' of this Plan. **Where there is a difference between the two sets of parking standards the more restrictive maximum standard (i.e. permitting a lower number of parking spaces) will apply. For mixed-use non-residential schemes, parking spaces that are shared between different uses will be encouraged. ~~specific parking should be provided for different uses.~~***

To address the point about parking for GPs raised in the TfL Statement of Common Ground we recommend a revision to the proposed modification as shown below in red:

*Car Parking in new developments for GPs, health and educational facilities should follow ~~will be supported by following~~ the Council's maximum parking standards set out in Appendix 1 of this Plan and London Plan policies*

We welcome the additional reference to London Plan Guidance on Parking Design and Management in part I and the additional requirement for a Car Parking Management Plan where car parking is re-provided as part of Council housing estate regeneration schemes in part M.

MM9 – We note the addition of ‘Reopening of the Meridian Line’ to the list of key infrastructure projects. We have previously stated our view that this project (previously referred to in the draft Local Plan as the Hall Farm Curve) does not have a strong business case and due to infrastructure constraints is unlikely to be feasible within the Local Plan timescale. We believe that other public transport projects such as Walthamstow Central Station Transport Interchange, Leyton Underground Station Improvements and Superloop express bus services should be the priority during the Local Plan period and would not wish to see scarce resources diverted from these projects.

MM128 – It is not clear why it is proposed to modify point C to remove reference to public transport so that it reads

*‘Increase the ~~number~~ proportion of trips made by walking, cycling and public transport and cycling, and improve local connections and facilities for these modes, in line with Policy 63 ‘Active Travel’ and Policy 64 ‘Public Transport’.*

The Mayor’s targets for mode share are to increase the proportion of trips by walking, cycling and public transport and so the wording is no longer consistent with the approach in the Mayor’s Transport Strategy or the London Plan. We would strongly recommend that the previous wording of point C is reinstated.

However, we welcome the addition of new point I ‘*Deliver car-free development to reduce car dominance in terms of congestion and excessive parking on the street*’.

We also support the proposed modification to point J to add in ‘*local bus service improvements*’ to the list of sustainable transport initiatives that reduce demand for car ownership which may be helpful in securing developer contributions towards bus service improvements.

MM129 – We welcome the proposed modification to paragraph 15.9 which now refers to delivery of 15-Minute Neighbourhoods

MM130 – We welcome the proposed modification to Policy 63 which adds in a new reference to *'the delivery of 15-Minute Neighbourhoods'*

MM131 – We note the proposed modification to Policy 64 which specifically refers to working with TfL Network Rail and other partners to reopen the Meridian Line. The inclusion of a specific infrastructure project in a general policy is unfortunate given TfL's stated clearly stated view that the project does not have a strong business case and due to infrastructure constraints is unlikely to be feasible within the Local Plan timescale. The policy does not refer to any other public transport projects and so the inclusion of the reopening of the Meridian Line on its own appears to give it undue prominence. Notwithstanding our concerns about the project's viability, we accept that it is one of the Council's long-term aspirations and that its inclusion here is in response to representations.

We welcome the addition of wording to refer to the phased introduction of a fully electric bus fleet.

MM133 – We support the proposed modifications to Policy 65 which provide greater clarity on the requirements for Transport Assessments, Travel Plans, Construction Logistics Plans and Delivery and Servicing Plans

MM134 – The proposed modifications to paragraph 15.24 including the additional reference to Delivery and Servicing Plans to paragraph are helpful although the list of guidance should also be expanded to refer to TfL's Delivery and Servicing Plans guidance (2020)

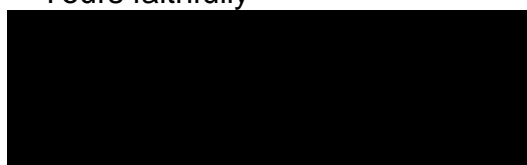
MM136 – We support the proposed modifications to Policy 66 which provide greater clarity on the requirements for Delivery and Servicing Plans

MM137 – We support the proposed modifications to Paragraph 15.25 which provide greater clarity on the content of Delivery and Servicing Plans

MM138 – We support the proposed modifications to Policy 67 which provide greater clarity on the requirements for Construction Logistics Plans

We trust that these amendments, which we believe are necessary to ensure clarity, consistency and soundness of Local Plan transport policies, will be incorporated before the Local Plan is finalised.

Yours faithfully



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